

**UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS**

SHAWN DRUMGOLD,	)	C.A. NO. 04-11193NG
Plaintiff	)	
	)	
v	)	
	)	
TIMOTHY CALLAHAN, ET AL.	)	
Defendant(s)	)	
	)	

**PLAINTIFF'S EXHIBITS IN OPPOSITION TO DEFENDANTS' MOTION FOR SUMMARY  
JUDGMENT**

**EXHIBIT**

1. Motion for New Trial, July 29, 2003, Volume 1, pp. 22-23, 29, 66, 139-140, 161-168, 171, 175-177, 183, 185-188.
2. Motion for New Trial, July 30, 2003, Volume 2, pp. 2-16, 48
3. Motion for New Trial, July 31, 2003, Volume 3, pp. 25-28, 50, 74-75, 87-89, 97-98, 142.
4. Motion for New Trial, August 4, 2003, Volume 4, pp. 33.
5. Motion for New Trial, August 5, 2003, Volume 5, pp. 177-180, 186.
6. Motion for New Trial, August 6, 2003, Volume 6, pp. 67, 135, 139-140, 147-148, 152-155, 164, 174, 176-177, 181, 258-261, 267-268.
7. Affidavit of Betty Peaks, May 28, 2003.
8. Deposition of Tracie Peaks  
(a) Volume I, April 28, 2006, pp. 56, 105-106, 108, 142-143, 146, 149-162, 186-187, 235.  
(b) September 15, Volume II, pp. 22-23, 49, 52-54, 71-75.
9. Deposition of Richard Walsh.  
(a) September 14, 2006, Volume I, pp. 22-23, 30-31, 65, 84-87, 101-102, 145, 147.  
(b) February 19, 2007, Volume III, pp. 176-178, 182-183, 191-193, 201-204.

10. Deposition of Robert George, February 13, 2007, pp. 57-58.
11. Commissioners Special Citation, December 22, 1988.
12. Deposition of Rickey Evans
  - (a) June 26, 2006, Volume I, pp. 116, 119, 124-125, 163-167, 205-206, 223, 225-226, 230-233, 237-243, 259- 260, 268, 272-273, 278-279.
  - (b) July 10, 2006, Volume II, 295-296, 530, 543-544.
13. Affidavit of Olisa Graham, December 9, 2002.
14. Exhibit 14, Tracie Peaks Deposition, April 28, 2006.
15. Affidavit of Tracie Peaks, May 28, 2003.
16. Deposition of Betty Peaks, March 2, 2006, pp. 28-30, 41, 57-59, 76-79, 83.
17. Medical Records of Mary Alexander from Carney Hospital (excerpts).
18. Affidavit of Lola Alexander, May 28, 2003.
19. Deposition of Lola Alexander, April 4, 2006, pp. 40-45, 97-98, 102-105, 295, 305.
20. Deposition of Steven Rappaport  
February 3, 2007, Volume II, pp. 222-223, 245-246.
21. Deposition of Vantrell McPherson
  - (a) March 17, 2006, Volume I, pp. 44, 57, 135, 154, 169.
  - (b) May 22, 2007, Volume II. pp. 22, 44.
22. Affidavit of Vantrell McPherson, May 30, 2003.
23. Trial Voir Dire, September 1989, pp. 36-37, 45-46.
24. (a) Trial, October 2, 1989, Volume 4, pp. 84-89, 118-123, 135-139.  
(b) Trial, October 4, 1989, Volume 6, pp. 79-82.
25. Boston Globe, May 15, 2003, "A Third Witness Recants Testimony About '88 Killing".
26. Deposition of Shawn Drumgold
  - (a) May 18, 2007, Volume II, pp.71-73, 128, 211, 265-266.
  - (b) July 17, 2007, Volume III, pp. 166-173, 258-259.

27. Affidavit of Gemini Hullum, May 28, 2003.
28. Deposition of Paul McDonough, November 16, 2006, pp. 18-19, 30-42.
29. Deposition of Timothy Callahan, September 8, 2006, Volume I, 31-32, 35-36, 46-48, 61-62, 70-75, 131-133, 140.
30. Deposition of Paul Connolly, January 5, 2007, pp. 16-17.
31. Report of Boston Police Department Management Review Committee.
32. 30-Day St. Clair Implementation Report.
33. Neighborhood Police-A Plan for Action for the Boston Police Department.
34. Deposition of John Daley
  - (a) November 15, 2006, Volume I, pp. 9-10, 13-18, 20-21, 29-30
  - (b) January 23, 2007, Volume II pp.90-94, 97-98, 101, 114-115
  - (c) February 21, 2007, Volume III, pp. 194, 212-214.
35. Deposition of Edward McNelley, June 27, 2007, pp. 15, 125-128.
36. Affidavit and Report of Dr. Michael Lyman, August 13, 2007.
37. Deposition of Frances Roache, February 12, 2007, pp.7-8, 18-23, 27-38, 46-54.
38. Report of Homicide Investigation, August 26, 1988.
39. Statement of Antonio Anthony, August 31, 1988.
40. Deposition of Francis O'Meara, December 14, 2006, pp. 39
41. Dorchester District Court Criminal Docket Records of Ricky Evans
42. Affidavit of Michael W. Reilly Re: Doherty Documents
43. U.S. Department of Justice, July 10, 1991, Press Release
44. *Commonwealth v. Tarahn Harris*, Findings of Fact and Ruling of Law on Defendant's Motion to Dismiss
45. *Commonwealth v. Christopher Harding*, Memorandum and Order on Defendant's Motion for New Trial
46. Deposition of Ralph Martin, February 26, 2007, pp. 8-16.

47. Exhibit 206 from John Daly's Deposition, December 24, 1985, May 17, 1985, May 19, 1985 with redactions.
48. Exhibit 207 from John Daly's Deposition pp. 85, 229, 251 with redactions